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*Attorneys for Plaintiffs and the Proposed Class
(Additional Counsel Listed on Signature Page)*

*Social Finance, Inc. d/b/a SoFi and
SoFi Lending Corp. d/b/a SoFi*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

RUBEN JUAREZ, CALIN CONSTANTIN
SEGARCEANU, EMILIANO GALICIA, and
JOSUE JIMENEZ, on behalf of themselves
and all others similarly situated,

Plaintiffs,

vs.

SOCIAL FINANCE, INC. d/b/a SOFI, and
SOFI LENDING CORP. d/b/a SOFI,

Defendants.

Case No.: 4:20-cv-03386-HSG

**JOINT STIPULATION AND ORDER TO
STAY LITIGATION (as modified)**

District Judge: Haywood S. Gilliam, Jr.
Complaint filed: May 19, 2020
First Amended Complaint Filed: July 30, 2020
Second Amended Complaint Filed: May 3,
2021

Pursuant to Civil Local Rules 6-1(b) and 6-2, Plaintiffs Ruben Juarez, Calin Constantin
Segarceanu, Emiliano Galicia, and Josue Jimenez ("Plaintiffs"), through counsel, along with
counsel for Defendants Social Finance, Inc. d/b/a SoFi and SoFi Lending Corp. d/b/a SoFi

(collectively, “SoFi,” and together with Plaintiffs, the “Parties”), respectfully submit the following Joint Stipulation and Proposed Order to Stay Litigation.

RECITALS

WHEREAS, on May 19, 2020, Plaintiff Juarez filed a putative class action Complaint against SoFi in the above-captioned matter, asserting violations of the Civil Rights Act of 1866, 42 U.S.C. § 1981, and the California Unruh Civil Rights Act, Cal. Civil Code §§ 51, *et seq.*, (D.E. 1);

WHEREAS, on July 30, 2020, Plaintiffs Juarez and Segarceanu filed a First Amended Complaint, adding named Plaintiff Segarceanu and claims under the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.* (D.E. 33);

WHEREAS, on May 3, 2021, Plaintiffs filed a Second Amended Complaint (as authorized by the Court), incorporating additional named Plaintiffs Jimenez and Galicia (D.E. 56, 62);

WHEREAS, following the May 4, 2021 case management conference, the Court entered a Scheduling Order on May 12, 2021, pursuant to which fact discovery closes April 3, 2022 (D.E. 66);

WHEREAS, on July 15, 2021, the Parties participated in a private mediation session with JAMS arbitrator David Geronemus, Esq., during which they were ultimately unable to reach a settlement;

WHEREAS, since July, the Parties have moved forward with litigation, while the mediator has remained engaged and the Parties have also continued to explore avenues for a potential resolution of the matter;

WHEREAS, the Parties are at the point where they have made substantial progress on the material terms of a proposed settlement such that they wish to focus their efforts on negotiating the remaining terms and, if an agreement is finalized, memorializing those terms into a written settlement agreement, thereby conserving resources and limiting the accrual of attorneys’ fees and costs on both sides;

1 WHEREAS, in the absence of a stay, the Parties would need to press forward with costly
2 and time-consuming discovery, including five party depositions noticed for November, and related
3 motion practice, in order to meet the current discovery deadlines;

4 WHEREAS, a stay will further conserve judicial resources; and

5 WHEREAS, the Parties affirm that no party will be prejudiced by this stipulation, nor will
6 the requested extension unduly delay the case;

7 **STIPULATION**

8 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs
9 and SoFi through their respective undersigned counsel that:

- 10 1. All formal discovery, discovery obligations and motion practice shall be suspended
11 and stayed for sixty (60) days, (until December 28, 2021) to enable the Parties to
12 conserve resources and focus their efforts on settlement;
- 13 2. The Parties will submit an update to the Court on or before December 28, 2021 in
14 which they will apprise the Court of the status of their settlement efforts and propose
15 a timeline for either settlement approval or renewed litigation;
- 16 3. In the event the stay is lifted, the Parties will work cooperatively together to
17 reschedule depositions and deadlines to any other pending discovery demands in a
18 timely manner;
- 19 4. This stipulation is without prejudice to the rights, claims, arguments, and defenses
20 of all Parties; and
- 21 5. All other signatories listed, and on whose behalf the filing is submitted, concur with
22 the content in this Stipulation and have authorized the filing.

23 IT IS SO STIPULATED.

OUTTEN & GOLDEN LLP

Dated: November 1, 2021

By: /s/ Ossai Miazad

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MCGUIRE WOODS LLP

Dated: November 1, 2021

By: /s/ Issac deVyver

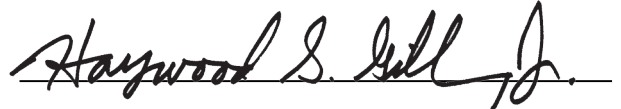
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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The parties are cautioned that to the extent they are unable to settle this case by December 28, the parties should be prepared to proceed under the current case schedule.

DATED: 11/3/2021,

A handwritten signature in black ink, reading "Haywood S. Gilliam, Jr.", written over a horizontal line.

Haywood S. Gilliam, Jr
United States District Judge